

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
(SAN FRANCISCO DIVISION)

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Case No. 07-5944 SC  
MDL No. 1917

### This Document Relates to:

## ALL INDIRECT PURCHASER ACTIONS

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*  
Case No. 3:11-cv-05513

*Best Buy Co., Inc., et al. v. Technicolor SA, et al.*, Case No. 13-cv-05264

*CompuCom Systems, Inc. v. Hitachi, Ltd., et al.,*  
Case No. 3:11-cv-06396

*Costco Wholesale Corp. v. Hitachi, Ltd., et al.,*  
Case No. 3:11-cv-06397

*Electrograph Systems, Inc., et al. v. Hitachi, Ltd., et al.* Case No. 3:11-cv-01656

*Electrograph Systems, Inc., et al. v. Technicolor SA, et al.* Case No. 3:13-cv-05724

*Interbond Corp. of America v. Hitachi, Ltd., et al.* Case No. 3:11-cv-06275

*Interbond Corp. of America v. Technicolor SA, et al.* Case No. 3:12-cv-05727

*Office Depot, Inc. v. Hitachi, Ltd., et al., Case No. 3:11-cv-06276*

*Office Depot, Inc. v. Technicolor SA, et al., Case No. 2-12-cv-05726*

*P.C. Richard & Son Long Island Corp., et al. v.  
Hitachi, Ltd., et al.* Case No. 2-12-cv-02648

**[PROPOSED] ORDER GRANTING  
DEFENDANTS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT  
ON PLAINTIFFS' INDIRECT  
PURCHASER CLAIMS BASED ON  
FOREIGN SALES**

[PROPOSED] ORDER GRANTING DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT  
ON PLAINTIFFS' INDIRECT PURCHASER CLAIMS BASED ON FOREIGN SALES

Case No. 07-5944 SC, MDL No. 1917

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2 *P.C. Richard & Son Long Island Corp., et al. v.*  
3 *Technicolor SA, et al., Case No. 3:13-cv-05725*

4 *Sears, Roebuck & Co. and Kmart Corp. v.*  
5 *Chunghwa Picture Tubes, Ltd., et al., Case No.*  
6 *3:11-cv-05514*

7 *Tech Data Corp., et al. v. Hitachi, Ltd., et al.,*  
8 *Case No. 3:13-cv-00157*

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White & Case LLP  
701 Thirteenth Street, NW  
Washington, DC 20005

[PROPOSED] ORDER GRANTING DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT  
ON PLAINTIFFS' INDIRECT PURCHASER CLAIMS BASED ON FOREIGN SALES  
Case No. 07-5944 SC, MDL No. 1917

1       Upon consideration of Defendants' Notice of Motion and Motion for Partial  
2 Summary Judgment on Plaintiffs' Indirect Purchaser Claims Based on Foreign Sales, as well  
3 as well as any responses and replies thereto, it is hereby:

4       ORDERED that the motion is GRANTED; and it is further

5       ORDERED that all state law claims asserted by plaintiffs in the above-titled actions  
6 are hereby dismissed with prejudice to the extent that such claims involve CRT Products or  
7 CRTs incorporated in such products that were first sold to a non-conspirator outside the  
8 United States.

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10      **IT IS SO ORDERED.**

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12      Dated: \_\_\_\_\_

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14      HONORABLE SAMUEL CONTI  
15      UNITED STATES DISTRICT JUDGE

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DECLARATION OF DANA E. FOSTER IN OPPOSITION TO PLAINTIFFS'  
MOTION TO COMPEL DEFENDANTS TO PRODUCE ENGLISH TRANSLATIONS  
Case No. 07-5944 SC  
MDL No. 1917